

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

DWAYNE R. TORRENCE, JR.,

Plaintiff,

v.

BARTELS, M.D., *et al.*

Defendants

Civil Action No. SAG-20-1223

**JOINT MOTION TO AMEND NOVEMBER 19, 2020 ORDER**

The parties jointly move the Court to amend its November 19, 2020 Order as requested below.

1. On November 19, 2020, the Court entered an Order setting forth the pre-trial deadlines to which the parties are required to adhere ("November 19 Order").
2. Plaintiff is currently incarcerated at Jessup Correctional Institution.
3. Due to the COVID-19 pandemic, access to Jessup Correctional Institution, experts, and deponents is delayed.
4. To that end, the parties request that the Court amend the November 19 Order to reflect the following pretrial schedule and supersede the pretrial scheduling deadlines:

March 1, 2021:	Joint request for early settlement/ADR conference (This request will not postpone discovery unless otherwise ordered.)
March 1, 2021:	Report about deposition hours
March 1, 2021:	Initial report whether there is unanimous consent to proceed before a United States Magistrate Judge
March 1, 2021:	Deadline for conference about discovery of electronically stored information. (If either or both

parties intend to take such discovery, before the conference counsel should review the Principles for the Discovery of Electronically Stored Information in Civil Cases prepared by a Joint bench/bar committee published on the court's website.)

April 4, 2021:	Moving for joinder of additional parties and amendment of pleadings
April 19, 2021:	Plaintiff's Rule 26(a)(2) disclosures
May 16, 2021:	Defendant's Rule 26(a)(2) disclosures
June 1, 2021:	Plaintiff's rebuttal Rule 26(a)(2) disclosures
June 8, 2021:	Rule 26(e)(2) supplementation of disclosures and responses
July 1, 2021:	Discovery deadline; submission of status report
July 8, 2021:	Requests for admission
August 3, 2021:	Dispositive pretrial motions deadline

Dated: December 1, 2020

Respectfully submitted,

**MARKS, O'NEILL, O'BRIEN,  
DOHERTY & KELLY, P.C.**

**BAKER & McKENZIE LLP**

\_\_\_\_\_/s/  
Patricia H. Beall, Esq.  
(signed by George M. Clarke with the  
permission of Patricia H. Beall, Esq.)  
Bar No. 29593  
600 Baltimore Avenue, Suite 305  
Towson, MD 21204  
Tel: (410) 339-6880  
Fax: (410) 339-6881  
pbeall@moodklaw.com

\_\_\_\_\_/s/  
George M. Clarke  
Bar No. 16688  
815 Connecticut Avenue NW  
Washington, DC 20006  
Tel: (202) 452-7057  
Fax: (202) 416-7024  
george.clarke@bakermckenzie.com

*Attorney for Defendants Bartels, Williams,  
Alenda, DeRosa, Awanga, Tatong,  
Hargraves, and Wright*

*Attorney for Plaintiff, Dwayne R. Torrence, Jr.*